

Urban Flood Risk Reduction (UFRR) Program Response to Comments

Draft UFRR Program Guidelines, Draft UFRR Program Proposal Solicitation Package (PSP), and Cost Share Guidelines released to public in July 2014

Summary: The Draft UFRR Program Guidelines, associated PSP, and Cost Share Guidelines were released for public comment in July 2014 for 45 days. Over 400 comments were received from the public and each one was evaluated carefully. If appropriate, the comments were incorporated into the final version of the documents.

The majority of the comments can be summarized into major categories which are discussed below.

General Comments: Comments were received of a general nature that included notes of wrong section references, spelling errors, changes requested to definitions, changes in terminology for consistency, and notes of outdated references. All comments were incorporated as appropriate.

Clarification of Intent: Many comments were received that either asked clarifying questions and/or suggested additional language to clarify the intent of the proposed language. These comments were all evaluated carefully and language incorporated as appropriate to make the intention clear.

Clarification of Requirements: Many comments were received that made cases for clarity of requirements required for the different project phases (feasibility studies, design, or construction projects). Clarifying language has been added to the Guidelines and PSP as appropriate in this matter.

Many comments also suggested deletion of requirements. The primary area was the requirement of application materials required for feasibility studies. While we understand that many items will not be able to be completed fully for a feasibility study application, we are asking for preliminary project information at the readily available level of detail so that a funding decision may be made.

Real Estate: Several comments were received trying to clarify requirements especially related to the project real estate plan, eligible costs, and requesting that the State release funds sooner for acquisitions. Many proposed definitions were added to the Guidelines. Many of the comments received regarding real estate have been noted and

will be included in the UFRR Program Funding Agreement template and/or the Real Estate Exhibits Binder, as this was the more appropriate location for the comment. Eligible and non-eligible real estate costs have been clarified in Section 6 of the Guidelines (Eligible Project Costs). A major concern that was noted was the need for funds to be released sooner for real estate acquisitions. An adjustment has been made to the real estate payment schedule. There is also potential for funding recipients to reduce project retention to 5% or below based upon the state's risk evaluation and funding recipients performance record.

Payments and Costs: A few comments received were asking to clarify eligible costs. These comments have been addressed in Section 6 of the Guidelines (Eligible Project Costs). A few comments were received related to payments in relation to the need for cash flow. The UFRR Program can issue payment advances on a semi-annual basis instead of a quarterly basis. Between the bi-annual advances and the potential to reduce retention below 10% (based on the state's risk evaluation and the funding recipients performance record), the local agencies should have more cash available for project needs.

Cost Share and/or Ranking: Several comments were received that asked for more cost share and/or ranking points in certain elements and less for others. The comments often were in conflict with each other. After reviewing the cost share guidelines and ranking table, no changes have been made. It is felt that the cost share guidelines and ranking table represent a balanced approach for multi-benefit projects.

If you have a specific concern on how a particular comment was addressed, please email your concern to Kelly Fucciolo at Kelly.Fucciolo@water.ca.gov with your telephone number, and we will try to provide further clarification.